

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
WESTERN DIVISION

**VERNITA BELL, INDIVIDUALLY  
AND ON BEHALF OF E.A.B., JR.,  
DECEASED, ET AL.**

**PLAINTIFFS**

**VS.**

**CAUSE NO. 5:09CV192KS-MTP**

**TEXACO, INC., ET AL.**

**DEFENDANTS**

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**MOTION FOR EXTENSION OF TIME**

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**COME NOW** the Plaintiffs, by and through counsel, and file this, their Motion for Extension of Time, and in support of said motion would show unto the Court the following:

1. On October 13, 2010, the Defendant, Texaco, Inc., propounded certain discovery requests to the Plaintiffs.
2. On December 1, 2010, the Defendant filed a Motion to Compel Responses to Interrogatories and Requests for Production of Documents.
3. An Order Granting Motion to Compel Discovery was entered on December 20, 2010. Pursuant to said Order, the Plaintiffs are required to file their responses to the Defendant's discovery requests, on or before January 4, 2010 (2011).
4. Due to the Christmas holidays and the inability of counsel for the Plaintiffs to confer with all of the individual Plaintiffs, the Plaintiffs will be unable to file

their discovery responses on or before the deadline of January 4, 2010 (2011).

5. The Plaintiffs request an additional ten (10) days within which to respond to the subject discovery requests, or until January 15, 2011.

6. This motion is not made for the purpose of delay or other improper purposes.

7. The Defendants oppose the present motion.

WHEREFORE, PREMISES CONSIDERED, the Plaintiffs respectfully request that this Court enter an Order granting to them an additional ten (10) days within which to respond to the Defendant's discovery requests, or until January 15, 2011.

Respectfully submitted,

Vernita Bell, Jestina Alsworth, Patricia Felton, Brenda Doss, Katie Colenburg, Thelma Sanders, Carl Ellis, John Scott, Mary Culbert, Betty Scott, James Scott, Bertha Franklin, and Levander Davis

BY: /s/ Eduardo A. Flechas

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**CERTIFICATE OF SERVICE**

I, Eduardo A. Flechas, do hereby certify that I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel of record.

SO CERTIFIED, this, the 3<sup>rd</sup> day of January, 2011.

/s/ Eduardo A. Flechas